

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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| In re VASO ACTIVE PHARMACEUTICALS) | Master Docket No. 04-10708-RCL |
| SECURITIES LITIGATION) | |
| _____) | <u>CLASS ACTION</u> |
| This Document Relates To:) | NOTICE OF MOTION AND MOTION TO |
| ALL ACTIONS.) | APPOINT THE CHAE GROUP AS LEAD |
| _____) | PLAINTIFF AND TO APPROVE LEAD |
| | PLAINTIFF'S SELECTION OF LEAD |
| | COUNSEL |

PLEASE TAKE NOTICE that Ki & Young Chae, Norman Brodeur and Joseph Salmassi (the “Chae Group”), who purchased Vaso Active Pharmaceuticals, Inc. (“Vaso Active” or the “Company”) securities between December 11, 2003 and March 31, 2004 (“Class Period”), hereby move this Court for an Order granting the Chae Group’s Motion for Appointment as Lead Plaintiff and Approval of Lead Plaintiff’s Selection of Lead Counsel pursuant to §21D(a)(3)(B) of the Securities Exchange Act of 1934. This Motion is based upon this notice of motion, the accompanying memorandum of points and authorities in support thereof, the Affidavit of John E. DeWick, the pleadings and other files and records in each of these actions, and such other written or oral argument as may be permitted by the Court.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Movant hereby requests oral argument on this motion.

DATED: June 7, 2004

Respectfully submitted,

MELICK, PORTER & SHEA, LLP
RICHARD J. SHEA, BBO #456310
JOHN E. DeWICK, BBO #654723

/s/ John E. DeWick
JOHN E. DeWICK

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each party by mail on 6/7/04

/s/ John E. DeWick

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